

EXHIBIT NO. 4

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

3 Case No. 2:23-cv-09412 CBM (AGR)
4 (Consolidated Case No. 2:24-cv-04898-CBM(AGR))

5 D.S., ET AL.

6 Plaintiffs,

7 vs.

8 CITY OF HUNTINGTON PARK, ET AL.,

9 Defendants.
10 _____/

11
12
13 DEPOSITION OF EUGENIA ESPINOZA
14 Pages 1 through 73
15

16
17 TAKEN ON BEHALF OF THE DEFENDANTS
18 Friday, December 6, 2024
19 10:09 a.m. - 4:17 p.m.

20 (Remote location)
21

22 REPORTED BEFORE:
23 ERIN C. LEHNEN, COURT REPORTER
24 NOTARY PUBLIC, STATE OF FLORIDA
25

EUGENIA ESPINOZA
DECEMBER 06, 2024

JOB NO. 1318519

APPEARANCES OF COUNSEL

ON BEHALF OF THE PLAINTIFFS:

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ALSO PRESENT:

Estela Moll, Spanish interpreter

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(NO EXHIBITS MARKED)

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1 Deposition taken before Erin C. Lehnen,
2 Court Reporter and Notary Public in and for the State
3 of Florida at Large in the above cause.

4 *****

5 THE COURT REPORTER: Please raise your right
6 hand.

7 Do you swear that you will truly and
8 accurately translate the following proceedings from
9 English to Spanish and Spanish to English, and that
10 you have such ability to do so?

11 THE INTERPRETER: Yes.

12 *****

13 THE COURT REPORTER: Please raise your right
14 hand.

15 Do you swear or affirm that the testimony you
16 are about to give will be the truth, the whole
17 truth, and nothing but the truth?

18 THE WITNESS: I swear.

19 THEREUPON:

20 EUGENIA ESPINOZA
21 having been first duly sworn to tell the truth, as
22 hereinafter stated, was examined and testified as
23 follows:

24 DIRECT EXAMINATION

25 BY MR. COLVIN:

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1 son that resides with you currently?

2 A. Oscar Ernesto Castillo Espinoza.

3 Q. And how long have you been married to
4 William Castillo?

5 A. Seventeen years.

6 Q. And how old is Oscar today?

7 A. Fifteen.

8 Q. And back in October of 2022 when the incident
9 occurred, with whom were you residing at the Malabar
10 address at that time?

11 A. William Castillo, my husband; Oscar Castillo,
12 my son, Omar Castillo, and William Rene Salgado.

13 Q. What is your relationship to William Salgado,
14 or what was your relationship to William Salgado?

15 A. He was my stepson, well to me he was a son.

16 Q. Do you know his date of birth?

17 A. 11-9, I believe it is, 1991 approximately.

18 Q. Do you know where he was born?

19 A. Nicaragua.

20 Q. Do you know an individual by the name of
21 Ensto Salgado Peralta?

22 A. He was the adopted father of William Salgado.

23 Q. Do you know when this adoption took place?

24 A. No.

25 Q. Do you know where the adoption took place?

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1 A. No.

2 Q. Do you know whose name appears as the
3 biological father on William's birth certificate?

4 A. William Castillo.

5 Q. If you know, did this adoption by Mr. Peralta
6 of William take place after your marriage to
7 William Castillo?

8 A. No.

9 Q. Can you repeat it, please?

10 A. No.

11 Q. Do you know a Juana Marie Ximena Jiménez
12 (phonetic)?

13 A. Yes.

14 Q. And do you know what relationship she had to
15 William Salgado.

16 A. His grandmother.

17 Q. And do you know if Juana Marie Ximena Jiménez
18 is also the adopted mother of William Salgado?

19 A. Yes.

20 Q. How do you know that?

21 A. My husband told me.

22 Q. When did your husband tell you that?

23 A. I don't remember.

24 Q. To your knowledge, was Juana Marie Ximena
25 Jiménez married to Ensto Salgado Peralta?

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1 Q. Do know you, does Elizabeth go by any other
2 name other than Elizabeth?

3 A. Isabella.

4 Q. To your knowledge, did William and Elsa have a
5 child by the name of Marilyn?

6 A. There's four of them.

7 Q. Yes, but my question is, to your knowledge,
8 did they have a child that's still alive by the name of
9 Marilyn?

10 A. No.

11 Q. To your knowledge, did William have any other
12 children other than the four that you just named?

13 A. No.

14 Q. Do you remember the date of the incident
15 involving William and the police officers?

16 A. Yes.

17 Q. What was the date?

18 A. October 30, 2022.

19 Q. Do you know what day of the week that was?

20 A. Sunday.

21 Q. Back on October 30th of 2022 you mentioned
22 that William Salgado was living with you and your
23 family at that time, is that true?

24 A. Yes.

25 Q. Back on October 30th of 2022, was Elsa Acosta

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1 also living at your Malabar address?

2 A. No.

3 Q. To your knowledge, when did William Salgado
4 move into your apartment before October 30, 2022?

5 A. 2021.

6 Q. Do you know what month he moved in in 2021?

7 A. No.

8 Q. Do you know where he was living before he
9 moved in with you on October 30, 2022?

10 A. With Carolina.

11 Q. Do you know the address?

12 A. No.

13 Q. Do you know the city?

14 A. I don't remember.

15 Q. Did Elsa Acosta and her children ever reside
16 with you and your husband at the Malabar address ever?

17 A. No.

18 Q. Do you know where William Salgado was residing
19 in 2020?

20 A. I don't remember.

21 Q. Do you know where he was residing in 2019?

22 A. No, I don't remember.

23 Q. Do you know where he was residing in 2018?

24 A. No, I don't remember.

25 Q. Do you know if William Salgado ever lived on

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1 Q. And did William go upstairs after your husband
2 told him to do so?

3 A. No, because the officer told him not to leave
4 with us.

5 Q. Him meaning William Salgado?

6 A. Yes. Yes.

7 Q. Okay. So then at that point did you, your son
8 and your husband go upstairs and go into the apartment?

9 A. Yes, we stayed on the balcony.

10 Q. And at any point did you leave the balcony
11 before the shooting and go into the apartment?

12 A. My husband stayed.

13 Q. Did you go into the apartment at that point?

14 A. Yes.

15 Q. Did your son go with you into the apartment at
16 that point?

17 THE INTERPRETER: I'm sorry, Counsel, can you
18 repeat the question for the interpreter?

19 BY MR. COLVIN:

20 Q. Did your son go in with you at that point into
21 the apartment?

22 A. Yes, only my husband and Omar remained
23 outside.

24 Q. To your knowledge, at any point before the
25 shooting started did your husband enter into the

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1 When you first heard the shots you were in the living
2 room at that time, or another room?

3 A. In the living room.

4 Q. Okay. And at that time you heard the shots
5 start, was anyone else with you in the living room?

6 A. My son Oscar.

7 Q. Was Omar there also in the apartment at that
8 time?

9 A. He was with my husband outside, they went
10 outside to the -- how do you call it -- the balcony.

11 Q. I want to make sure I understand. When you
12 first heard the shots you indicated that your husband
13 was by the entrance to the door; is that true, or not
14 true?

15 A. Yes.

16 Q. Okay. So after the shots is that when, to
17 your knowledge, your husband and your other son went
18 out to the balcony?

19 A. When he heard the first shot he went outside.

20 Q. Okay. So when you heard the first shots, did
21 you see where your husband was located inside the
22 apartment?

23 A. By the door, right outside the door.

24 Q. Okay. So he was outside the screen door, or
25 inside the screen door?

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1 MR. HOLM: Join.

2 BY MR. COLVIN:

3 Q. You can answer.

4 A. Yes.

5 Q. When you and your husband and your son went
6 into the apartment when the officers told you to do so,
7 did you see your husband close the door to the
8 apartment before the shooting started?

9 A. I don't remember.

10 Q. Did you close the door after you and your
11 husband and your son entered the apartment after the
12 officers told you to do so?

13 MR. LEVINE: Asked and answered.

14 THE WITNESS: No.

15 BY MR. COLVIN:

16 Q. After the shots were finished, did you go
17 outside to the balcony and join your husband after the
18 shots had finished?

19 A. Yes.

20 Q. Did you actually see the officers at any time
21 shoot your son, or were you in the apartment the whole
22 time?

23 MR. LEVINE: Vague.

24 THE WITNESS: I was in the apartment.

25 BY MR. COLVIN:

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1 A. Yes.

2 Q. And it's your testimony that you heard
3 William Rene speaking to the officers in English before
4 the shots were fired and you didn't understand what he
5 was saying?

6 A. Yes.

7 Q. Did you notice anything unusual about
8 William Rene's behavior that day before the shooting
9 started?

10 MR. LEVINE: Vague as phrased. You can
11 answer.

12 THE WITNESS: No, everything -- no.

13 BY MR. COLVIN:

14 Q. Did he seem to be acting normal that day to
15 you?

16 MR. LEVINE: Same objection.

17 MR. HOLM: Join.

18 BY MR. COLVIN:

19 Q. You can answer. What was that response?

20 A. Yes.

21 MR. HOLM: And late objection, also calls for
22 an expert opinion.

23 BY MR. COLVIN:

24 Q. So I want to go back for a moment. When the
25 officers told you and your husband and your son to go

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1 correct, right?

2 A. Yes.

3 MR. COLVIN: Okay, I'd also like to take
4 another 10-minute break. I'm almost done here, but
5 I want to take one more break here.

6 MR. LEVINE: Sure, sounds good.

7 MR. COLVIN: Okay, we'll wrap up in about
8 20 minutes. Thank you.

9 (A short break was taken.)

10 BY MR. COLVIN:

11 Q. Ms. Espinoza, I just want to confirm that
12 Osmar told you he did witness the shooting; is that
13 correct?

14 A. Yes.

15 Q. Did he tell you he saw William Rene throw a
16 knife at the officers?

17 MR. HOLM: Assumes facts. Lacks foundation.
18 You can answer.

19 THE WITNESS: I don't remember him telling me
20 that.

21 BY MR. COLVIN:

22 Q. Okay. After the paramedics, and I believe the
23 fire department, arrived do you know where they took
24 William Rene's body?

25 A. According to them, to the hospital.

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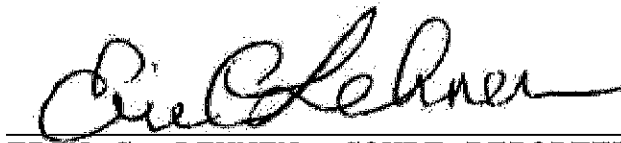
CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF PALM BEACH

I, ERIN LEHNEN, the undersigned authority,
certify that EUGENIA ESPINOZA remotely appeared before
me and was duly sworn.

Witness my hand and seal this 18th day of
December, 2024.



ERIN C. LEHNEN, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA
Commission No: HH291088
Commission Exp: July 21, 2026